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Attorneys for Plaintiffs,

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

**PACIFIC GULF SHIPPING CO. AND
MICHAEL ELSE & COMPANY LTD.
IN ITS OWN RIGHT AND AS
SUBROGEE OF PACIFIC GULF
SHIPPING CO.,**

Plaintiffs,
vs.

**ADAMASTOS SHIPPING & TRADING
S.A., VIGOROUS SHIPPING &
TRADING S.A., BLUE WALL
SHIPPING LTD., PHOENIX SHIPPING
& TRADING S.A., THALASSA
HOLDINGS S.A., ALASTOR MARINE
S.A., GEORGE GOURDOMICHALIS,
and EFSTATHIOS
GOURDOMICHALIS**

Defendants.

No. 3:18-CV-02076-MO

In Admiralty

**PLAINTIFFS' RESPONSE IN
OPPOSITION TO MOTION TO DISMISS**

PLAINTIFFS' RESPONSE IN OPPOSITION TO MOTION TO DISMISS

COME NOW, Plaintiffs Pacific Gulf Shipping Co. and Michael Else & Company Ltd. in its Own right and as subrogee of Plaintiff Pacific Gulf Shipping Co. ("Plaintiffs"), by and through undersigned counsel and files this response in opposition to Defendants' Motion to Dismiss the Third Amended Complaint filed on October 29, 2019 (DE 181).

Plaintiffs respectfully oppose the Motion to Dismiss for the reasons outlined in the Response in Opposition to Motion to Dismiss (DE 169), Declaration of Kevin Simon Cooper (DE 170), and Declaration of Briton P. Sparkman (DE 171) previously filed with this Court.

WHEREFORE, premises considered, Plaintiffs request that the motion be denied in its entirety and that Plaintiffs be granted such other and further relief as is just and proper.

DATED: November 11, 2019 Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing pleading via cm/ECF to all counsel of record in accordance with the Fed. Rules of Civil Procedure on this 11th day of November:

/s/ Briton P. Sparkman
Briton P. Sparkman